## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

BENJAMIN CRAIG, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

CENTURYLINK, INC., GLEN F. POST, III and R. STEWART EWING, JR.,

Defendants.

DON J. SCOTT, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST, III, R. STEWART EWING, JR. and DAVID D. COLE,

Defendants.

AMARENDRA THUMMETI, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

CENTURYLINK, INC., GLEN F. POST, III, and R. STEWART EWING, JR.,

Defendants

Civil Action No: 17-cv-01005

Judge Robert G. James

Magistrate Judge Joseph H. L. Perez-Montes

Civil Action No.: 17-cv-01033

Judge Robert G James

Magistrate Judge Joseph H. L. Perez-Montes

Civil Action No.: 17-cv-04695

Joint Stipulation filed on August 16, 2017 to transfer case to U.S.D.C. Western District of Louisiana

## [PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING SONA ANDRESIAN LEAD PLAINTIFF AND APPROVING LEAD PLAINTIFF'S CHOICE OF COUNSEL

Having considered the motion of Sona Andresian (the "Motion"), and all papers in support thereof and in opposition thereto, and oral argument, if any, and good cause appearing therefore:

- 1. The Motion is hereby granted;
- 2. The above-captioned actions are hereby consolidated;
- 3. Movant Sona Andresian is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by Section 10(b) of the Private Securities Litigation Reform Act of 1995; and
- 4. The law firm of Gainey McKenna & Egleston is hereby appointed as lead counsel and the law firm of Pendley, Baudin & Coffin is appointed liaison counsel for the Class.
- 5. Lead Counsel is hereby vested by the Court with the following responsibilities and duties in connection with this action:
  - A. To direct and coordinate the briefing and arguing of motions;
- B. To direct and coordinate the initiation and conduct of discovery proceedings, including, but not limited to, requests for production of documents and/or third-party subpoenas;
- C. To direct and coordinate the examination of witnesses in depositions and oral interrogatories;
  - D. To act as spokesperson at pretrial conferences;
- E. To call meetings of plaintiffs' counsel as appropriate or necessary from time to time;

- F. To direct the preparation for a trial of this matter and to delegate work responsibilities to selected counsel as may be required in such a manner as to lead to the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort;
- G. To direct and coordinate the conduct of pre-trial, trial and post-trial proceedings;
  - H. To consult with and employ experts;
- I. To coordinate and collect monthly time and expense reports from all plaintiffs' attorneys in this action;
- J. To initiate and conduct all settlement negotiations with counsel for defendants; and
- K. To perform such other duties as may be expressly authorized by further order of the Court.
- 6. No motion, request for discovery, or other pre-trial proceedings shall be initiated or filed by any plaintiff except through Lead Counsel.
- 7. Defendants' counsel may rely upon all agreements made with Lead Counsel, and such agreements shall be binding on all plaintiffs in this action.
- 8. Lead Counsel are hereby designated as the counsel for plaintiffs upon whom all notices, orders, pleadings, motions, discovery, and memoranda may be served and defendants shall effect service of papers on plaintiffs by serving Gainey McKenna & Egleston, 440 Park Avenue South, 5<sup>TH</sup> Floor, New York, NY 10016.
- 9. If defendants file a single pleading or other paper directed to all plaintiffs in this action, the response on behalf of plaintiffs shall be made in a single pleading or other paper to be served by Lead Counsel. All plaintiffs shall be bound by that pleading or paper.

10. The organizational structure established by this Order shall bind counsel for plaintiffs in this action or any subsequently filed cases consolidated therewith.

IT IS SO ORDERED.	
DATED:	
	UNITED STATES DISTRICT JUDGE